

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

02-CR-73-A(1), (5), (9), (15)

MARK CONGI,
ALBERT CELESTE,
PAUL BELLRENG,
JOEL CICERO,

Defendants.

GOVERNMENT'S EXPERT DISCLOSURE

The United States of America, by and through its attorney, Terrance P. Flynn, United States Attorney for the Western District of New York, and William J. Hochul, Jr., and Brett A. Harvey, Assistant United States Attorneys, hereby submits its expert disclosure pursuant to Rule 16(a)(1)(E) of the Federal Rules of Criminal Procedure, and requests leave to submit such other disclosures as may be appropriate prior to or at the close of the evidence.

1. Kelly Mount, Chemist/Forensic Examiner

Kelly Mount is currently a Chemist/Forensic Examiner with the Federal Bureau of Investigation. Attached hereto is a copy of Ms. Mount's curriculum vitae (Exhibit 1). Ms. Mount will testify concerning her analysis of three pieces of brick and three pieces of duct tape recovered from 53 Steele Circle (Wildwood Acres) on April 21, 1997. Specifically, Ms. Mount will testify that, during her examination of these items, she found residues consistent with

those found after the deflagration of some pyrotechnic compositions (explosives) on one piece of the duct tape and each of the three pieces of brick. Ms. Mount's analysis and findings regarding the pieces of brick and duct tape are more fully detailed in her notes and laboratory report, which were provided to defense counsel on January 19, 2006.

DATED: Buffalo, New York, July 12, 2006.

Respectfully submitted,

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John Molloy, Esq.
Joseph M. LaTona, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2006, I electronically filed the foregoing **Government's Expert Disclosure** with the Clerk of the District Court using its CM/ECF system which would then electronically notify the following CM/ECF participant(s) on this case:

Joel L. Daniels, Esq.

Terrence M. Connors, Esq.

John J. Molloy, Esq.

I hereby certify that on July 12, 2006, I mailed the foregoing **Government's Expert Disclosure**, by the United States Postal Service, to the following non-CM/ECF participant(s):

Joseph M. LaTona, Esq.
716 Brisbane Building
Buffalo, New York 14203

s/Karen A. Brown
KAREN A. BROWN